Fact Sheet:

Class II Permit Modification and Review of Remedial Investigation (RI) Report, Emerald Services, Inc., Tacoma (WAD 981 769 110)

Emerald Services, Inc, located at 1825 Alexander Avenue, Tacoma, WA, 98421, proposes a Class II modification to its dangerous waste storage permit (WAD 981 769 110) pursuant to WAC 173-303-830 [Permit Changes]. Emerald proposes changes to the permit's Inspection, Closure, Contingency, and Waste Analysis Plans, Section D.2.2.2 of the Container Management section of the Part B Permit Application, and its corrective action permit condition. Emerald is also providing a remedial investigation (RI) report for public review and comment pursuant to WAC 173-340-600 [Public notice and participation].

Documents are available for review and duplication, from February 16, 2003 through April 17, 2003, at: the Main Tacoma Public Library, Cascade Room A, 1102 Tacoma Avenue South, Tacoma, WA; the Washington Department of Ecology, Southwest Regional Office, 300 Desmond Drive, Lacey, WA, (360) 407-6365; and Citizens for a Healthy Bay, 917 Pacific Avenue, Suite 406, Tacoma, WA. The permittee's compliance history during the life of the permit being modified is available from the Washington Department of Ecology contact person.

A public meeting on the proposed changes is scheduled for March 17, 2003 from 4:30 p.m. to 6:30 p.m. in the Main Tacoma Public Library, Cascade Room A.

Comments on the permit modification and the RI report should be sent to the Washington Department of Ecology contact person, Ms. Kerry Graber, Hazardous Waste and Toxics Reduction Section, Washington Department of Ecology, Southwest Regional Office, PO Box 47775, Olympia, WA 98504-7775, (360) 407-6754. Ms. Sheila Smith, Environmental Coordinator, represents Emerald Services, Inc. and may be reached at (253) 370-7912.

Class II Permit Modification

Emerald Services, Inc. purchased the Sol-Pro, Inc. facility in May of 2000. Since that purchase, Emerald Services, Inc. has made continual upgrades to facility operations. These upgrades have been performed, to some extent, at the direction of Department of Ecology. Others have been performed following approval by Ecology. Based on these upgrades, changes in the existing permit have been required to adequately and accurately describe the Emerald Services, Inc. Tacoma operation. Plans which are addressed in this Class II Permit Modification request include: Waste Analysis Plan, Contingency Plan, Closure Plan, Inspection Plan, and the Container Management Section of the Part B Permit Application.

The facility's Waste Analysis Plan has been modified to more accurately describe the analytical procedures which will be performed by the facility for waste streams which are either being evaluated prior to approval for shipment, or which have been received at the facility for management. The Waste Analysis Plan has been modified to ensure waste streams accepted at the Emerald facility will be managed safely and within the limitations of the Part B Permit and other applicable regulations.

The Contingency Plan has been modified to include more specific information regarding emergency equipment available on-site. This is the second modification within the past year; the first being the modification to identify changes to the facility as well as changes in facility personnel.

The Closure Plan has been updated to include current ownership, closure cost, and facility-ownership information.

The Inspection Plan has been updated to include all newly constructed areas of the facility as well as specific areas for inspection as requested by the Department of Ecology.

A modification to section D.2.2.2 of the Part B Permit Application is also included to allow more flexibility for Emerald when storing containers. As indicated in the applicable text, all containers will be stored according to Fire Code requirements, but the specific arrangement will vary according to the current needs of the facility.

Remedial investigation (RI) report and modifications to corrective action permit condition

The public is invited to review and comment on a remedial investigation (RI) report and other documents prepared for the Emerald Services facility. The previous owner of the Tacoma facility, Sol-Pro, Inc., conducted a remedial investigation (RI) and submitted a report on their investigation to the Department of Ecology in 2000. When Emerald Services, Inc. assumed ownership of the Tacoma facility in 2000, they became subject to the corrective action requirements (WAC 173-303-646) to address releases, and potential releases, of dangerous wastes, including dangerous waste constituents, to soils or groundwater at the facility.

The RI report summarizes the results of quarterly water level measurements; a 72-hour tidal study; and soil, groundwater, and sediment sampling. Soil sampling was conducted in 1993. None of the constituents analyzed exceeded cleanup levels except for barium, which exceeded the Method B cleanup level protective of groundwater. Since groundwater sampling at the facility did not show barium contamination, the barium in the soil at the site does not appear to have a significant environmental impact on groundwater. Other reports of soil and groundwater investigations conducted before Emerald Services purchased the facility and during construction of a stormwater system indicate levels of contamination below cleanup levels for most constituents of concern at the facility. Because of intermittent exceedences of cleanup levels for hydrocarbons, arsenic, and lead in groundwater, further monitoring for the constituents of concern is recommended.

Within 30 days of the effective date of the proposed permit modification, Emerald Services shall submit a work plan for continuing periodic groundwater monitoring to the Department of Ecology. After Ecology's review and written approval, the work plan will be become an enforceable part of Emerald's permit. The proposed permit modification requires submittal of an annual groundwater data analysis report to Ecology. Emerald will continue to be required to maintain existing monitoring wells at the facility. Development of a feasibility study (FS) will not be required unless continued monitoring indicates a release, or potential release, of hazardous substances.

The RI report and other reports, supporting documents, and the proposed permit language for corrective action are available for review and copying at the addresses listed above. Comments on these documents should be sent to Kerry Graber at the Department of Ecology at the address listed above.